

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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In the Matter of

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Filing and Review of
Bell Operating Company
Open Network Architecture Plans

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CC Docket No. 88-2
Phase I

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**SOUTHWESTERN BELL TELEPHONE, L.P.'S, PACIFIC BELL TELEPHONE COMPANY'S,
NEVADA BELL TELEPHONE COMPANY'S, AND THE AMERITECH OPERATING COMPANIES'
OPEN NETWORK ARCHITECTURE ANNUAL REPORT**

Southwestern Bell Telephone, L.P. (SBC Southwest); Pacific Bell Telephone Company (Pacific Bell), and Nevada Bell Telephone Company (Nevada Bell) — collectively "SBC West"; and Illinois Bell Telephone Company, Indiana Bell Telephone Company, Inc., Michigan Bell Telephone Company, The Ohio Bell Telephone Company, and Wisconsin Bell, Inc. — formerly known as the Ameritech Operating Companies and collectively referred to as "SBC Midwest"¹ file their Open Network Architecture (ONA) annual report, as required by the Commission's Second BOC ONA Amendment Order² and its Memorandum Opinion and Order of March 29, 1993.³

I. Background and Information

In the *BOC ONA Further Amendment Order*, the Commission established certain annual reporting requirements, and, in the *MO&O*, it added one annual reporting requirement. All of those requirements are addressed here.

¹ These companies will be referred to collectively as "the reporting entities."

² *In the Matter of Filing and Review of Open Network Architecture Plans*, Memorandum Opinion and Order, CC Docket No. 88-2, Phase I, 6 FCC Rcd 7646 (1991) (*BOC ONA Further Amendment Order*).

³ *In the Matter of Filing and Review of Open Network Architecture Plans*, Memorandum Opinion and Order, CC Docket 88-2, Phase I, 8 FCC Rcd 2606, ¶ 10 (1993) (*MO&O*).

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II. Annual Report

A. Annual Projected Deployment Schedules For ONA Services

Attached, as Exhibit A, is the three-year estimated deployment information for the reporting entities' ONA network capabilities as of December 31, 2004, 2005, and 2006. This information represents SBC Communications Inc.'s (SBC) future plans, some of which have not yet been officially funded. Even if funding becomes available, exact deployment time frames are still not guaranteed, and, thus, the projected service may not actually become available in the reported period. These plans are subject to review and change as demand, finances, equipment availability, regulatory mandates, legal requirements, and other conditions change the plans for network evolution. Such factors may cause certain offerings — now deemed to meet the Commission's four criteria for "key" ONA services — to no longer meet those criteria.

B. New ONA Service Requests From Enhanced Service Providers⁴

In the *BOC ONA Further Amendment Order*, the Commission requires the reporting entities to report on new ONA service requests from enhanced service providers (ESPs) and the disposition of such requests.⁵ Five types of dispositions are possible:

- *Category 1 – Developed.* The requested service has been developed and is available (or will be upon tariff approval).
- *Category 2 – Under development.* The requested service is under development and will generally be available within a year.
- *Category 3 – Further evaluation planned.* The requested service is not currently available, but certain conditions may develop that could possibly change its status. The request will be re-evaluated within a time frame specified in the request response.
- *Category 4 – Pending evaluation.* The request is currently being evaluated within the 120-day request cycle

⁴ For clarity, the reporting entities will continue to refer to "enhanced service providers," instead of "information service providers."

⁵ *BOC ONA Further Amendment Order*, ¶ 18.

- *Category 5 – No Further activity planned.* The request cannot be met for the reason specified in the response, or the requesting party chooses no further activity after receiving the response.

For the calendar year 2003, the reporting entities received two ESP Requests for new ONA capabilities. The first request, for a 13-state Near-Real-Time ordering interface, was responded to on May 29, 2003. The response stated the requested interface could be made available 15 months after an order is executed. No order was received and the product was not developed. By a letter dated May 19, 2003, addressed to SBC Midwest, and by a letter dated June 26, 2003, addressed to SBC Southwest, a voice-messaging ESP requested a “gift billing” arrangement for the provisioning of Call Forward/Busy Don’t Answer and Message Waiting Indicator. These companies responded to these requests on August 7, 2003, and July 24, 2003, respectively, advising that they did not deem the requests to be valid new ONA service requests. The ESP has challenged this decision and the parties are negotiating this dispute. At present, the companies are developing a 120-day, new ONA service request analysis as part of the parties’ discussions. As of the date of the filing of this report, the parties are still negotiating over this dispute and no service has yet been developed in response to this request.

C. ONA Service Requests Previously Deemed Technically Infeasible

Attached, as Exhibit B, is a list of ONA services sought by the ESP market at the commencement of the ONA proceedings.⁶ Some of these original requests are now technically feasible, but are not being offered or developed because they do not meet one or more of the Commission’s three other criteria — market demand, costing and technical feasibility, or utility to ESPs. Further, the other services could potentially be developed with the emergence of future technologies.

D. SS7, ISDN, and IN Projected Deployment

Attached as Exhibit C is the reporting entities’ projected deployment of Signaling System 7 (SS7), Integrated Services Digital Network (ISDN), and Intelligent Networks (IN). These

⁶ Nomenclature used in this Exhibit is the same as that used in Appendix A & B, which are Pacific Bell’s, Nevada Bell’s and SWBT’s ONA Report, March 31, 2003 and Ameritech’s ONA Report, March 31, 2003.

deployment projections reflect the percentage of access lines in exchanges where SS7, ISDN, and IN capability is projected. The same qualifications explained above also apply to these projections.

E. New ONA Services Available Through SS7, ISDN, and AIN

While the reporting parties continue to introduce and trial new SS7, ISDN, and AIN (Advanced Intelligent Networks) technologies, these new services are not offered as ONA services as defined by the Commission. Instead, these services are being offered in response to market demand within the SBC region. Consequently, there were no new ONA services introduced as a result of an ESP request in 2003.

**F. Progress On Network Interconnection/Architecture Committee (NIAC)
Efforts On Continuing Activities For The Implementation Of Service
Specific And Long-Term Uniformity Issues**

The Network Inter-Operability Council (NIOC), a subcommittee of the Network Interconnection Interoperability Forum (NIIF),⁷ has closed all previous ESP issues.

G. Progress In Providing Billing Information

1. Billing Name And Address (BNA)

In accordance with the Commission's decision in CC Docket 91-115, *Second Order on Reconsideration*,⁸ federal tariffs for BNA were filed and became effective April 9, 1994 for SBC

⁷ The Network Testing Committee (NTC), formerly known as the (IITP), was formed in 1992 at the request of the Commission, as a result of a series of network service outages during early 1990. In 1996, as a result of an Alliance for Telecommunications Industry Solutions (ATIS) Board mandate to consolidate three existing forums: the Industry Information Liaison Committee (IILC), the Industry Carrier Compatibility Forum (ICCF) and the Network Operations Forum (NOF) into one forum, the NTC was formed after the Network Interoperability Interconnection Forum (NIIF). This was done to create a more efficient and effective environment to meet the needs of telecommunications service providers, enhanced service providers and service customers. After that reorganization, on September 18, 1997, the NTC was spun off from the NIIF as a means to streamline the process of facilitating industry funding and testing. The NTC now reports to the Internetwork Interoperability Test Coordination (IITC) Committee, which is a standing committee of ATIS. The leadership of the NTC is provided by the participants. See *Computer III Further Remand Proceedings: Bell Operating Company Provision of Enhanced Services; etc.*, Further Notice of Proposed Rulemaking, 13 FCC Rcd 6040, 6097 (¶ 106) (1998).

⁸ *In the Matter of Policies and Rules Concerning Local Exchange Carrier Validation and Billing Information for Joint Use Calling Cards, Petitions for Waiver of Rules Adopted in BNA Order, Second Order on Reconsideration*, CC Docket No. 91-115, 8 FCC Rcd 8798 (1993).

Southwest. A copy of SBC Southwest's Transmittal No. 2334 was provided in its April 15, 1994, ONA Plan Amendment.

The SBC Midwest offers a "Subscription Billing Service," which allows a customer to put charges on a separate page of their telephone bill. This billing product is offered on a region-wide basis. Subscription Billing Service provides billing information to the customer — as well as the creation, rendering, and collection of a bill as part of the service. To complement these functions, Subscription Billing Service offers administrative and bill collection date reports to the ESP. Currently, the SBC Midwest provides the option of electronic filing transfer, using Network Data Mover (NDM) Software, to receive detailed billing information from ESPs. This provides Ameritech with the details required for billing the ESPs' services to their subscribers on the ESPs' page in the SBC Midwest bill. In addition to the receipt of billing details from the ESPs, the SBC Midwest sends reports to the ESP providing billing error and status information.

The SBC Midwest offers BNA service on an intrastate basis in Indiana, Michigan, Ohio, and Wisconsin in accordance with state tariffs, which reference FCC 2. In Illinois, BNA is provided in accordance with Illinois Tariff 21, Section 13.3.8.

Pacific Bell provides billing and collection service on an intrastate basis in accordance with Schedule Cal. P.U.C. 175-T, Section 8.4.3 to certified interexchange carriers (IXCs) and on an interstate basis under contract.⁹ As noted in earlier filings, Rule 35 of the California Public Utilities Commission (CPUC) A.2 tariff and the CPUC tariff 175-T prohibit Pacific Bell from providing BNA service to ESPs. Pacific Bell has anticipated action on the part of the CPUC to revise these rules for the past several years, but to date the investigation into this matter remains open.¹⁰

⁹ While billing and collection services are detariffed in the interstate jurisdiction, Pacific Bell complies with the rules and regulations set forth in CPUC 175-T in providing billing and collection on an interstate basis.

¹⁰ *Rulemaking on the Commission's Own Motion to Govern Open Access to Bottleneck Services and Establish a Framework for Network Architecture Development for Dominant Carrier Network, Order Instituting Rulemaking and Order Instituting Investigation*, R-93-04-003 (California Public Utilities Commission, April 7, 1993).

Since 1994, as a result of the Commission's order in Docket 91-115, the reporting entities have made BNA available through federal tariffs to ESPs and others on an interstate basis.¹¹ At Pacific Bell, BNA is available through FCC 1. Nevada Bell has tariffed BNA in Nevada's FCC Tariff No. 1, Section 6. Billing name and address service is provided when the customer needs the information to bill a call, and the originating number is provided via a magnetic tape that contains the originating numbers. BNA is available in the Nevada intrastate tariff PSCN C8.

As noted in previous amendments, Pacific Bell offers billing services to ESPs. This billing service is the same as Pacific Bell provides to its enhanced services operation. Nevada Bell has been included in the development of Pacific Bell's billing services for ESPs and currently offers third-party billing services.

2. Line-Side Calling Number Identification (CNI)

SBC Southwest currently offers Caller ID in Oklahoma, Kansas, Arkansas, Missouri, and Texas. Caller ID is offered with free "Per-call Blocking" capability in all SWBT states. "Per-0 Blocking" enables a customer to temporarily block the delivery of the Calling Party Number (CPN) to the called party. The SBC Midwest and SBC West offer comparable services in their respective regions. In addition, in certain market regions, free "Per-line Blocking" is offered to law enforcement and domestic violence agencies. Per-line blocking blocks CPN delivery from all calls made. Missouri and Kansas also extend free per-line blocking to those employees of the law enforcement or domestic violence agencies that conduct official business from home. Texas and Ohio state law require that per-line blocking be offered to customers who write to the telephone company stating that they have a "compelling" need for per-line blocking.

3. Automatic Number Identification (ANI) and Call Detail

SBC Southwest currently provides ANI through the trunk-side BSA approved by the Commission in SBC Southwest's original ONA Plan. Generally, the ESP can determine the call detail information with its own recording equipment. SBC Midwest offers two BSEs — Calling

¹¹ *Policies and Rules Concerning Local Exchange Carrier Validation and Billing Information for Joint Use Calling Cards*, CC Docket No 91-115, Second Report and Order, 8 FCC Rcd 4478 (1993).

Billing Number Delivery and Flexible ANI — which are delivered on the Circuit Switched Trunk BSA (FG-D) and provide calling billing number. SBC Southwest and SBC Midwest currently do not provide call detail recording to ESPs; however, these reporting entities would certainly consider the provision of this service if sufficient demand existed. SBC Midwest does offer a service — Ameritech Call Detail Reporting Service (ACDRS) — that allows ESPs to obtain call detail information (both local and toll), within 24 to 72 hours after call completion. The customer can access this data on a dial-up basis via a personal computer and modem. When ACDRS is packaged with Call Detail Reporting Software, it provides a management tool. The customer can analyze and monitor telecommunications activity, analyze calling patterns and work activity, and monitor fraud and abuse. ACDRS enhances both Centrex and long distance services products by providing call detail information.

I. Progress On The Uniform Provision Of OSS Services

The reporting entities recognize that uniform provision of OSS services is a complex issue. Many systems having the functions that ESPs may currently find useful have evolved over long periods of time and utilize different architectures, programming language, etc. For example, as a result of a 1999 ESP request, Pacific Bell designed and built an electronic ordering interface for the ESP to pass orders to the Company.

J. BSEs Used in the Provision of SBC Enhanced Services

The *BOC ONA Further Amendment Order* requires that each BOC continue to report annually on the BSEs used in providing its own enhanced services. The reporting entities' affiliated enhanced services operations procure all underlying basic services at the same rates and on the same terms and conditions as non-affiliated ESPs.

K. Unbundling Related To New Technologies

As explained in SBC Southwest's, SBC West's, and the SBC Midwest's first filings in response to this requirement in July 1993, the reporting entities interpret this requirement to be a continuation of the Commission's interest in obtaining descriptions from BOCs of "how new technologies will be used, or could be configured, to offer [ONA] services that have been

requested” and “what capabilities, whether specifically requested or not, will be available that could be useful in offering services to ESPs.”¹² This interpretation of the reporting requirement is not only consistent with the Commission’s long-standing ONA directives, but also with the way that the reporting entities do business. The reporting entities unbundle and provide services enabled by technologies. The reporting entities do not unbundle and provide technologies to their customers.

III. Conclusion

The reporting entities’ ONA Annual Report complies with all Commission requirements.

Respectfully submitted,

PACIFIC BELL TELEPHONE COMPANY,
NEVADA BELL TELEPHONE
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TELEPHONE, L.P., ILLINOIS BELL
TELEPHONE COMPANY, INDIANA
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¹² *Filing and Review of Open Network Architecture Plans*, CC Docket No. 88-2 Phase I, Memorandum Opinion and Order, 4 FCC Rcd 1, ¶ 382 (1988).